

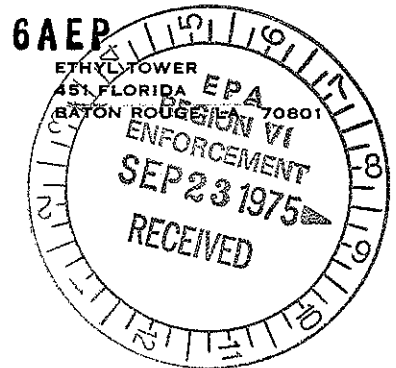
ETHYL CORPORATION

September 18, 1975

RECEIVED

SEP 24 1975

Mr. John C. White  
Regional Administrator  
Environmental Protection Agency  
1600 Patterson Street- Suite 1100  
Dallas, Texas 75201

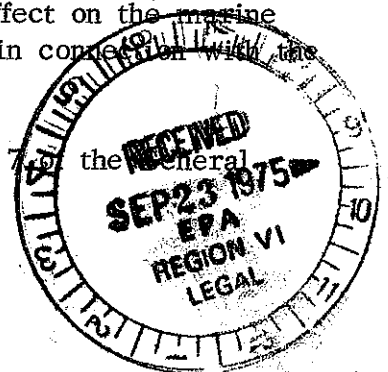


Ref. Ocean Dumping Permit 730D009C  
General Condition No. 11

Dear Mr. White:

Pursuant to instructions in Permit 730D009C this is to report the information as required in General Condition No. 11 thereof concerning dumpings that were initiated during the period beginning March 12, 1975 through September 1, 1975.

- 11a Information in the records to be kept pursuant to Paragraph 10 of the General Conditions.
- 10a The material is a waste sodium-calcium sludge, a mixture of solid metallic sodium, metallic calcium and oxides of these metals plus sodium and calcium chlorides. Sodium chloride is used as fill material added first to the bottom of the containing 55 gallon drum before the addition of the waste sodium calcium sludge and then to the top. The sodium chloride fills the void spaces and provides added weight to ensure sinking the drum. Analyses are listed in Exhibit A attached.
- 10b The precise times and locations of dumping are listed in the attached Exhibit B, Paragraph 7b.
- 10c We have no reports of any undesirable effect on the marine environment or human health or welfare in connection with the permitted dumping activities.
- 11b A summary of the reports required by Paragraph 7 of the General Conditions is given in Exhibit B.



Mr. John C. White  
September 18, 1975  
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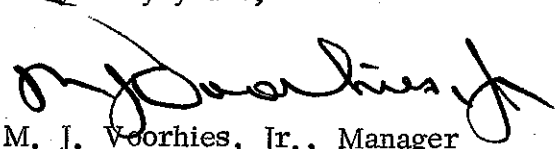
- 11c We have no additional reports or records, covered in Special Conditions of this Permit, to submit.
- 11d A composite sample representative of the barging operations carried out under this permit for the period March 12, 1975 ending September 1, 1975 has been analyzed in Ethyl's Chemical Research Laboratory for the parameters required as follows:

Trace Metal Content of Sodium-Calcium Waste (Composite Sample)  
(all analyses reported as mg/kg)

<u>Component</u>	<u>Limits of Detection</u>	<u>Analysis mg/kg</u>
Selenium	0.8	N.D.*
Arsenic	0.1	N.D.*
Beryllium	0.2	N.D.*
Vanadium	0.2	N.D.*
Nickel	0.2	N.D.*
Chromium		N.D.*
Zinc		8.4
Lead		10.8
Copper		1.9

\*Below detectable level

Very truly yours,

  
M. J. Voorhies, Jr., Manager  
Production Scheduling and Distribution

GEO:sak  
Attach.

CC: Mr. T. C. Coerver  
Mr. J. H. Huguet

## EXHIBIT A

### Chemical Analysis of the Material Dumped

Trip No.	No. 1	No. 2	No. 3
Permit No.	730D009C	730D009C	730D009C
Date Dumped	4-13-75	5-31-75	7-19-75

### Component

Sodium (Metal & Oxides)	65.9%	65.22%	65.8%
Calcium (Metal & Oxides)	9.5%	10.22%	9.5%
Oxygen (In Oxides)	5.0%	5.06%	5.1%
Sodium & Calcium Chlorides	19.6%	19.50%	19.6%
Cadmium	0.3 ppm	0.578 ppm	0.33 ppm
Mercury	<0.1 ppm	<0.1 ppm	<0.1 ppm

EXHIBIT B

## Paragraph 7a Quantity of Material Dumped

Trip No.	No. 1	No. 2	No. 3
Permit No.	730D009C	730D009C	730D009C
Date of Dumping	4-13-75	5-31-75	7-19-75
Number of Drums	700	700	673

Parts Per Million of Each Constituent

Sodium (in Metal & Oxides)	659,000 ppm	652,200 ppm	658,000 ppm
Calcium (in Metals & Oxides)	95,000 ppm	102,200 ppm	95,000 ppm
Sodium & Calcium Chlorides	196,000 ppm	195,000 ppm	196,000 ppm
Oxygen (in Oxides)	50,000 ppm	50,600 ppm	51,000 ppm
Cadmium	0.3 ppm	0.58 ppm	0.33 ppm
Mercury	<0.1 ppm	<0.1 ppm	<0.1 ppm
Total	1,000,000	1,000,000	1,000,000

Pounds of Each Constituent

Sodium (in Metal & Oxides)	228,344 lbs.	225,987 lbs.	219,203 lbs.
Calcium (in Metal & Oxides)	32,918 lbs.	35,412 lbs.	31,648 lbs.
Sodium & Calcium Chlorides	67,913 lbs.	67,568 lbs.	65,294 lbs.
Oxygen (in Oxides)	17,325 lbs.	17,533 lbs.	16,990 lbs.
Cadmium	0.10 lbs.	0.20 lbs.	0.110 lbs.
Mercury	<0.03 lbs.	<0.003 lbs.	<0.003 lbs.
Total	346,500	346,500	333,135

(Continued Exhibit B)

Paragraph 7b Time & Location of Barging & Dumping

Trip No. Permit No.	No. 1 730D009C	No. 2 730D009C	No. 3 730D009C
<u>Commenced Dumping</u>			
Date	4-13-75	5-31-75	7-19-75
Time	0730 hrs. CST	0715 hrs. CST	0645 hrs. CST
North Latitude	28 deg. 08 min.	28 deg. 09 min.	28 deg. 07 min.
West Longitude	89 deg. 21 min.	89 deg. 18 min.	89 deg. 28 min.
<u>Ceased Dumping</u>			
Date	4-13-75	5-31-75	7-19-75
Time	1330 hrs. CST	1205 hrs. CST	1130 hrs. CST
North Latitude	28 deg. 09 min.	28 deg. 05 min.	28 deg. 04 min.
West Longitude	89 deg. 27 min.	89 deg. 28 min.	89 deg. 27 min.
Midpoint when operation extended over six hours	Less than 6 hours	Less than 6 hours	Less than 6 hours

Paragraph 7c Departure and Return

Trip No. for Permit 730D009C	No. 1	No. 2	No. 3
Date Departure Baton Rouge	4-11-75	5-29-75	7-17-75
Time Departure	1030 hrs. CST	1445 hrs. CST	1820 hrs. CST
Date Returned Lockport	4-14-75	6-1-75	7-20-75
Time Returned	1400 hrs. CST	0900 hrs. CST	0800 hrs. CST